5. RECOMMENDATIONS AND POTENTIAL FUTURE DIRECTIONS

5.1 Recommended Uses for the Information

5.1.1 Developing Cross-Program Revitalization Measures

One objective of this land use/reuse assessment was to determine whether Regions can collect information to assist in the development of national cross-program revitalization measures. Region 3's land use assessment contributed to and enhanced the national dialogue on cross-program revitalization measures. The information collected is consistent with OSWER's proposed framework for possible cross-program revitalization measures described in the draft report, *Measuring Revitalization of Contaminated Sites in America's Communities: Past Accomplishments and Future Opportunities (July 27, 2005).*

That document proposes the following framework for consideration:

- Number and acres of properties addressed by OSWER cleanup programs
- Status of use (e.g., vacant, continued use, new use, or planned new use)
- Type of use (e.g., industrial, commercial, green space, residential, or municipal)
- Number and acres of properties confirmed protective for current and future uses

Region 3 established a cross-program baseline for: number of acres and sites addressed by cleanup program; Current Land Use; and Type of Use. With this baseline, the Region has the ability to develop an outcome measure to track changes in use and revitalization accomplishments into the future. Region 3's approach to collecting revitalization information provides a means to quantitatively demonstrate its success in reusing contaminated property; provides data to support the Agency's revitalization objectives; provides information that is feasible to collect across a range of programs; and provides information to integrate into strategic planning.

5.1.2 Facilitating Reuse of Underutilized Sites

A principle result of Region 3's land use/reuse assessment was the identification of vacant sites with potential for reuse. This information will enhance the Region's efforts to support reuse where appropriate. Additionally, Region 3 can plot vacant sites to identify clusters of sites within communities or specific geographic areas (watersheds, environmental justice areas, etc.) Potential options for facilitating reuse at vacant sites include:

- Outreach to affected communities regarding redevelopment resources
- Working with property owners to facilitate reuse
- Providing site specific information to facilitate reuse, such as Site Reuse Profiles or Ready for Reuse Determinations, as requested

May 2006 35

5.1.3 Tracking the Benefits of Reuse

Region 3 hoped to be able to use the information collected about benefits associated with land uses to report on the collective impact of the revitalization of contaminated sites. The Region believes it is important to have such information for the creation of success stories, fact sheets, news articles, etc. The assessment discovered that this kind of information is not typically collected by project managers. However, the benefits information reported was significant even though the Region was not able to gather information from all available sources. Nevertheless, the limited amount of information available does not provide a representative sample to allow programmatic impacts of the revitalization of contaminated sites to be analyzed.

5.2 Expand the Assessment to Other Types of Cleanup Sites

To achieve a more comprehensive cross-program measure, Region 3 is exploring the possibilities of expanding the collection of reuse information to other types of contaminated sites, including: Leaking Underground Storage Tank (LUST) sites; Superfund removal response actions; and RCRA Corrective Action medium and low priority sites. There are different complications with collecting reuse information for these kinds of sites. In general, much less site specific information is available. Consequently, any information collected will be more limited in scope than that collected using the existing Land Use/Reuse Assessment Form.

LUST sites

Because the LUST program is state-delegated, EPA generally does not receive site specific information about LUST sites. In a pilot effort to collect reuse information about LUST sites, EPA Region 3 has partnered with the State of Delaware Department of Natural Resources and Environmental Control to collect reuse information about LUST sites in the Wilmington, Delaware area. This project is currently underway and will test the feasibility and accuracy of using publicly available information from county and local tax records to determine current land use status and site size along with GIS mapping to establish an inventory of LUST brownfield properties. The initial focus of the reuse data collection effort is on LUST sites that have been cleaned up and are no longer registered as operating dispensing systems. If successful, this project could serve as a model for other states to facilitate reuse at LUST properties by establishing an inventory of cleaned up LUST sites.

RCRA Medium and Low Priority facilities

The RCRA Corrective Action program is currently tracking cleanup measures on the universe of sites which are deemed high priority as a result of screening using the National Corrective Action Prioritization System (NCAPs). While the program continues to move forward with cleanup goals for the high priority facilities, it is also developing a plan to address the low and medium ranked sites. It is estimated that there are about 300 low and medium priority sites to address in Region 3. The Region has tasked the regional library to perform a desk top analysis of these sites to determine the acres, current land use, type of use, and population density. The program will use this information to help prioritize which of the 300 low and medium sites should be addressed first through investigation and cleanup.

May 2006 36

Superfund Removal Response Actions

Although EPA is closely involved with activities at removal sites during the assessment and cleanup phase, EPA staff generally are not involved with activities at a site once the removal action is complete. As a result, information on land use is generally not readily available for completed removal actions. Occasionally, EPA does get involved with prospective purchasers to resolve liability and financial issues on sites where removal actions have already occurred. Under these circumstances, EPA may have access to information about property use and reuse. The Region is currently developing a plan to attempt to collect land use information at removal response action sites.

Brownfield sites

While it may be possible to collect limited information about the current use at brownfield sites funded with EPA Brownfields program grant dollars, such an effort would require surveying former grantees which would necessitate approval of an information collection request through OMB. Region 3 is not considering any options to survey brownfield sites at this time. For all current and new brownfield grantees, reuse information is captured as it occurs during the period of performance under the grant on the Property Profile Form which is then entered into the Assessment, Cleanup, and Redevelopment Exchange System (ACRES).

5.3 Develop a Database for Long Term Maintenance of the Information

For the Region to continue to collect this level of land use information, a streamlined electronic format is necessary. Ideally, site managers will input the information directly into the system. For RCRA any database developed needs to be designed to allow states to directly input information into the database. The Region could then pull either cross-program or single program reports from the database. Alternatively, it may be possible to adapt existing national databases, such as CERCLIS, to house the information. However there are several challenges to using existing national databases: modifying these databases will probably take much longer to implement; the Region would lose some of its ability to customize the data collected; these systems are designed for reporting rather than strategic planning; and it would not allow for cross-program analysis, since there is no one national data system for both Superfund and RCRA sites. The decision on how to proceed with future data collection and the long term maintenance of land use information will be highly dependent upon decisions made at the national level with respect to national measures and information management.

May 2006 37